

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NICOLE JENNINGS WADE,
JONATHAN D. GRUNBERG, and
G. TAYLOR WILSON,

Plaintiffs,

v.

L. LIN WOOD,

Defendant.

Case No. 1:22-CV-01073

NOTICE OF INTENT TO ISSUE SUBPOENAS

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Plaintiffs hereby notify the Court and all counsel of record that they propose to issue the following witness subpoenas on August 5, 2023 to following persons or entities:

1. Tyler Jones; and
2. L. Lin Wood.

True and correct copies of the foregoing proposed subpoenas are attached hereto as Exhibit 1.

Respectfully submitted this 2nd day of August 2024.

/s/ Milinda L. Brown
Andrew M. Beal
Georgia Bar No. 043842
Milinda L. Brown
Georgia Bar No. 363307

BEAL, SUTHERLAND,
BERLIN & BROWN, LLC
945 East Paces Ferry Road, NE
Suite 2000
Atlanta, GA 30326
678-439-0330
drew@beal.law
milinda@beal.law

CERTIFICATE OF COMPLIANCE

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as approved by the Court in LR 5.1C.

/s/ Milinda L. Brown
Andrew M. Beal
Georgia Bar No. 043842
Milinda L. Brown
Georgia Bar No. 363307
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing **Notice of Intent to Issue Subpoena** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing all attorneys of record.

/s/ Milinda L. Brown
Andrew M. Beal
Georgia Bar No. 043842
Milinda L. Brown
Georgia Bar No. 363307

EXHIBIT “1”

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

Wade, et. al.

Plaintiff

v.

L. Lin Wood

Defendant

Civil Action No. 1:22CV1073

SUBPOENA TO APPEAR AND TESTIFY
AT A HEARING OR TRIAL IN A CIVIL ACTION

To: Tyler Jones

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: United States Courthouse 75 Ted Turner Drive Atlanta, Georgia 30303-3309	Courtroom No.: 1906 Date and Time: August 8, 9:00 a.m.
---------------------------------------------------------------------------------------	-----------------------------------------------------------

You must also bring with you the following documents, electronically stored information, or objects *(leave blank if not applicable)*:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 8/2/2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Plaintiffs

, who issues or requests this subpoena, are:

Andrew Beal, Milinda Brown; Beal Sutherland Berlin & Brown, LLC, 2200 Century Parkway, Suite 100, Atlanta, GA 30350; telephone: (678) 439-0330; drew@beal.law, milinda@beal.law

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 1:22CV1073

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
 _____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
 _____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Georgia

Wade, et. al.

Plaintiff

v.

L. Lin Wood

Defendant

Civil Action No. 1:22CV1073

SUBPOENA TO APPEAR AND TESTIFY
AT A HEARING OR TRIAL IN A CIVIL ACTION

To: L. Lin Wood, Defendant

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: United States Courthouse 75 Ted Turner Drive Atlanta, Georgia 30303-3309	Courtroom No.: 1906 Date and Time: August 9, 9:00 a.m.
---------------------------------------------------------------------------------------	-----------------------------------------------------------

You must also bring with you the following documents, electronically stored information, or objects (leave blank if not applicable):

See attached Exhibit "A"

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date:

8/2/2024

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiffs

, who issues or requests this subpoena, are:

Andrew Beal, Milinda Brown; Beal Sutherland Berlin & Brown, LLC, 2200 Century Parkway, Suite 100, Atlanta, GA 30350; telephone: (678) 439-0330; drew@beal.law, milinda@beal.law

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Exhibit A
Subpoena to L. Lin Wood

- 1. All deeds of all real property owned by you, The Tomotley Crew, or any entity in which you hold greater than ten percent interest;**
- 2. All closing statements and settlement statements for all real property purchased by you, sold by you, or otherwise transferred by you within the last five years;**
- 3. Current statements for each and every banking, retirement, and brokerage account owned by you or in which you have an interest;**
- 4. All personal financial statements created by you or on your behalf in the last five years;**
- 5. All credit applications submitted by you or on your behalf to any financial institution in the last five years;**
- 6. All Federal and State income tax returns filed by you within the last five years, including all schedules, attachments, and statements thereto.**

AO 88 (Rev. 02/14) Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action (page 2)

Civil Action No. 1:22CV1073

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

 _____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
 _____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.: